

Gould, Steven

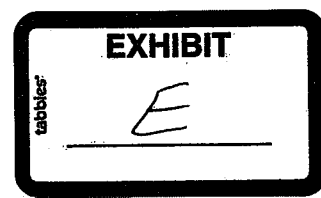
From: Susan Rotkis [srotkis@hotmail.com]
Sent: Friday, March 09, 2012 8:22 PM
To: Len Bennett; Srotkis@clalegal.com; jpmboyd@williamsmullen.com; dwinters@clalegal.com; rperrow@williamsmullen.com; Gould, Steven
Subject: SunTrust v. Mortgage Makers

Dear Steven: Here are the proposed topics that will be in our 30(b)(6) notice. We request dates for the fact witnesses as well.

This excerpt identifies the following topics on which examination will take place:

- a. All allegations of fact stated in the Complaint in this lawsuit.
- b. All affirmative defenses asserted by the Defendant.
- c. The net worth of the Deponent.
- d. The annual revenue of the Deponent.
- e. The net income of the Deponent.
- f. The details of the Plaintiff's relationship with Fannie Mae.
- g. The identity of any known witnesses to the allegations of fact stated in the complaint or the affirmative defenses asserted by the Defendant.
- h. The existence, nature, timing, and content of Deponent's decision procedures, policies, and practices for seeking to cause brokers with whom it has a relationship to re-purchase properties similar to the facts of this case.
- i. The nature, timing, content, substance and persons involved in Deponent's investigation of allegations of fraud related to mortgage applications.
- j. The nature and content of any records maintained by the Deponent relative to its underwriting decision procedures, policies, and practices regarding mortgage loans applications.
- k. The nature and content of any records maintained by the Deponent relative to the Deponent's negotiating procedures with Fannie Mae.
- l. Any communications between the Deponent and Defendant; between Deponent and Fannie Mae; between Deponent and the underwriter.

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- m. The existence, content, and delivery of any guidance, procedures, investigations, or the like, relating to mortgage applications.
- n. All facts relating to the investigation conducted by SunTrust in this case.
- o. All facts relating to SunTrust's litigation against mortgage brokers with facts similar to the facts in this case.
- p. Plaintiff's damages.
- q. All facts, information, research, and investigation about the Morell property that is the subject of this litigation, including any information regarding a foreclosure decision and its value from March 2007 through the present.
- r. All facts, information, research, and investigation of the fraud alleged on the mortgage application that is the subject of this litigation.
- s. All facts, information, research, decision-making concerning whether to foreclose on any property, including properties that SunTrust has repurchased notes from Fannie Mae.
- t. The policies and procedures used for advising underwriters, processors, and mortgage brokers concerning mortgage loan applications.
- u. All investigations, enforcement actions, regulatory actions, consumer complaints or any other type of complaint against SunTrust.
- v. The nature and content of Deponent's pre-acceleration and/or default notice procedures, policies and practices pursuant to a Deed of Trust.

Very truly yours,

Susy